

RECEIVED
FEDERAL ELECTION
COMMISSION

2012 NOV 15 PM 12:19

CELA



Re: AR 12-07

WewerLacy

to:

drawls, barrettgarcia

11/14/2012 08:34 PM

Cc:

alex

Hide Details

From: WewerLacy

To: drawls@fec.gov, barrettgarcia

Cc: alex@wewerlacy.com

History: This message has been forwarded.

We do not have any other information other than we were simply fundraising, the timing and audience of the letters were not voter lists, there was no consideration of whether the recipients could even vote, rather they were commercial proven donor lists only, and the intention of the fundraising letters was to raise funds from lists of donors, not persuade the voters to vote in a primary or general election during the period involved, so that we could subsequently make reported direct contributions to candidate committees, which is what we did. Our position continues to be that to characterize this activity as Independent Expenditure activity greatly exaggerates the actual activity of the committee and misleads the public.

Sincerely,

James V. Lacy

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